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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JEAN CLAIR MARKELL,)	
)	
Plaintiff,)	
v.)	No. CV 08 – 752PK
)	Amended Complaint for:
)	Age Discrimination in Employment
KAISER FOUNDATION HEALTH,)	
PLAN OF THE NORTHWEST,)	
an Oregon corporation,)	
)	JURY TRIAL REQUESTED
Defendant.)	

Plaintiff allege as follows:

1. Plaintiff, Markell, is an adult female citizen, born on 11/26/46, who
2. Defendant, Kaiser, is an Oregon corporation engaged in the business of providing medical services in Oregon.
3. This court has federal question jurisdiction over this action in which plaintiff asserts a claim for age discrimination under the

1. COMPLAINT

federal Age Discrimination in Employment Act (ADEA). All administrative exhaustion requirements have been met and this case is timely filed.

4. Markell worked for Kaiser as a Dental Hygienist from July of 1990 through November 18, 2005.

5. Markell was involuntarily terminated from her position.

6. She was terminated shortly before she could qualify for full retirement benefits.

7. Respondent has pursued a pattern or practice of targeting older employees, with substantial longevity for termination, before they qualify for full retirement benefits. 8.

Kaiser disciplined Markell for conduct that did not serve as a basis for discipline of similarly situated younger co-workers'.

9. Markell has a good employment record with Kaiser.

10. Age was a substantial motivating factor in the decision to terminate Markell.

11. Kaiser's conduct in terminating Markell was willful.

\iv1-iEREFOR, Marken prays for judgment against Kaiser for,

1. Economic damages in the form of back pay and front pay in an amount to be determined but not less than \$200,000,

2. Liquidated damages in an amount to be determined but not less than \$100,000,

2. COMPLAINT

3. Reasonable attorney fees,
4. The costs and disbursements of this action.

Respectfully submitted by:

S// Glenn Soloomon

Glenn Solomon #83328
Attorney for Plaintiff